

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

December 18, 2023

The Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs Executive Committees ("PECs"), on behalf of the Consolidated Amended Complaint ("CAC") Plaintiffs and the *Ashton* Plaintiffs, write to respectfully request the Court's authorization to file voluminous exhibits offered in support of Plaintiffs' consolidated opposition to the Kingdom of Saudi Arabia's motion to dismiss with the Clerk of the Court's office under seal via a hard drive. Plaintiffs' opposition is due this Wednesday, December 20, 2023. Plaintiffs would serve the exhibits on counsel for the parties via sharefile.

This Court previously authorized Plaintiffs to file voluminous evidentiary records in this manner, *see* Orders at ECF Nos. 3773 and 2929, and we understand that a specific order is required by the Clerk's office to file in this manner again on December 20. Plaintiffs do not want to risk overburdening the Court's Electronic Case Filing ("ECF") system with thousands of pages of exhibits, concerns raised by the Court's Clerk's Office in recent discussions on this very issue, and thus respectfully request the Court's endorsement of this proposal.

Plaintiffs thank the Court for its attention to this request.

Respectfully submitted,

COZEN O'CONNOR

By: /s/ Sean P. Carter

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*On behalf of the Plaintiffs' Executive
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*On behalf of the Plaintiffs' Executive
Committees*

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cc: All MDL Counsel of Record

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